

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF PUERTO RICO

UNITED STATES OF AMERICA,
Plaintiff,

v.

SANTOS PEREZ-BAEZ,
Defendant.

Criminal No. 25-177 (GMM)

SENTENCING MEMORANDUM

Santo¹ Perez-Baez has suffered deeply for his actions, and now simply wants to return to his family and his home in the Dominican Republic. At 61 years old, and after a hard life of labor on the seas, Santo suffers from a variety of health conditions that have only gotten worse during his time seeing this case. He is deeply repentant for his actions, more than anything because they have affected his family, and he has had to be without them for the first time in his life.

Santo grew up in a poor but loving household in the rural area of Bani, DR. His parents worked hard to feed and care for their nine children, and instill in them good values. When Santo was 16, he moved to Boca Chica where has lived ever since. From his first relationship he was two children, Rosa and Melvin, with whom he is very close. He has been married to his current wife, Gladys, for nearly 30 years, and they have to

¹ "Santo" is Mr. Perez-Baez's correct name; it was erroneously entered as "Santos" with the Court.

children together, Isauri and Miguel; he also helped raised Gladys' 3 children from a prior marriage. He and Gladys spend a great deal of time with their 33 grandchildren, who are the light of Santo's life. While working hard as a fisherman and merchant mariner, he has built a beautiful but humble life for himself and his family.



1 Santo with some of his grandchildren

very delicate. One of the heart attacks left him partially blind in his left eye. His legs swell painfully, especially his left leg, due to his poor circulation. In addition, Santo suffered the loss of his 3-year-old granddaughter a few years ago, which left him depressed and losing sleep. Because of his isolation

Of course, Santo's life has not been without its complications. He suffers from arthritis, high blood pressure and bad circulation relating to heart issues, which have been exacerbated during his time here away from his doctors and the comfort of his home and his wife's care. He has suffered two heart attacks in the last few years, and his heart condition is



2 Santo with his daughter, son and some of his grandchildren

in this case – his TPC, Miguel, works during the day and Santo, on home detention, is alone most of the time – he continues to be depressed and suffer from insomnia.



3 Isauri after her recent operation

Santo took the job that led to this case out of necessity – his daughter, Isauri, was in a bus accident that left her with a serious injury to her right foot and required surgery. However, the family did not have sufficient funds to cover the operation, and, when Santo was approached for the job soon after, he took it only to cover his daughter's surgery. He knows now how serious of a mistake that decision was. At this point, and with his health so poor and at his more advanced age, Santo simply looks forward to going

home to his family where he can finish out the rest of his days in peace. For that reason, Santo requests a sentence of time served.² Additionally, given that there is an immigration detainer against him and he will be deported upon completion of his sentence, he requests no supervision to follow pursuant to USSG § 5D1.1(c).³

² Santo was in custody for 9 days, from March 26, 2025 to April 3, 2025.

³ Pursuant to that provision, the court “ordinarily should not impose a term of supervised release in a case in which supervised release is not required by statute and the defendant is a deportable alien who likely be deported after imprisonment.” USSG § 5D1.1(c). No “added deterrence” is necessary here to make this case one that is out of the ordinary, given that Santo had prior legal visas to enter the country, showing compliance with immigration laws, and given his health, he is extremely unlikely to ever come back to the United States, legally or otherwise. USSG § 5D1.1, app. note 5.

I CERTIFY that on this date I electronically filed the present motion with the Clerk of the Court using the CM/ECF system, which will send electronic notification of said filing to all parties of record.

RESPECTFULLY SUBMITTED.

In San Juan, Puerto Rico, this 20th of May, 2025.

RACHEL BRILL
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